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10 Attorneys for Defendant
11 Mr. Wilson

12
13 IN THE UNITED STATES DISTRICT COURT
14 FOR THE EASTERN DISTRICT OF CALIFORNIA

15 UNITED STATES OF AMERICA,) Case No. 2:21-cr-155-JAM
16 Plaintiff,)
17 vs.) **STIPULATION AND ORDER TO CONTINUE**
18 JOSHUA WILSON and) **STATUS CONFERENCE AND EXCLUDE TIME**
19 CODY CRAMER,)
20 Defendants.)
21) Date: December 14, 2021
22) Time: 9:30 a.m.
23) Judge: Hon. John A. Mendez
24)

25 IT IS HEREBY STIPULATED and agreed by and between Acting United States
26 Attorney Phillip A. Talbert, through Assistant United States Attorney James R. Conolly, counsel
27 for Plaintiff; Federal Defender Heather Williams, through Assistant Federal Defender Hootan
28 Baigmoammadi, counsel for Defendant Joshua Wilson; and Kyle Knapp, counsel for Cody
Cramer that the status hearing currently set for December 14, 2021 at 9:30 be continued to
February 8, 2022 at 9:30 a.m.

The parties specifically stipulate as follows:

1. By previous order, this matter was set for a status on December 14, 2021 at 9:30
a.m.

2. By stipulation, Mr. Wilson now moves to continue the status conference to
February 8, 2022 at 9:30 a.m.

3. To date, the government has not produced discovery to the defendants. However,

1 the government represents that it will discover photographs and reports to Mr.
2 Wilson and Mr. Cramer by December 17, 2021. The government also intends to
3 discover video evidence and the parties are currently discussing the possibility of
4 a protective order.

5 4. Mr. Wilson and Mr. Cramer require additional time to review the discovery,
6 investigate and research possible defenses, research potential pretrial motions, and
7 explore potential resolutions to the case, and otherwise prepare for trial.

8 5. Mr. Wilson and Mr. Cramer believe that failure to grant the requested continuance
9 would deny them the reasonable time necessary for effective preparation, taking
10 into account the exercise of due diligence.

11 6. Neither the government nor Mr. Cramer object to the continuance.

12 7. For the purpose of computing time under 18 U.S.C. § 3161 *et seq.* (Speedy Trial
13 Act), the parties request that the time period between December 14, 2021 and
14 February 8, 2022, inclusive, be deemed excludable pursuant to 18 U.S.C. §
15 3161(h)(7)(B)(iv) (Local Code T4), because it would result from a continuance
16 granted by the Court at the defense's request, based on a finding that the ends of
17 justice served by granting the continuance outweighs the best interest of the
18 public, Mr. Wilson, and Mr. Cramer in a speedy trial.

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2 Respectfully submitted,
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4 HEATHER E. WILLIAMS
Federal Defender

5 Date: December 9, 2021
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/s/ Hootan Baigmohammadi
HOOTAN BAIGMOHAMMADI
Assistant Federal Defender
Attorneys for Mr. Wilson

8 Date: December 9, 2021
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/s/ Kyle R. Knapp
Kyle Knapp
Attorney for Mr. Cramer

11 Date: December 9, 2021
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PHILLIP A. TALBERT
Acting United States Attorney

/s/ James R. Conolly
James R. Conolly
Assistant United States Attorney
Attorneys for Plaintiff

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ORDER

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, adopts the parties' stipulation in its entirety as its order.

IT IS SO ORDERED.

Date: December 9, 2021

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ
UNITED STATES DISTRICT COURT JUDGE